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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

FILED
2014 DE 17 AM 11: 10
WESTERN DISTRICT OF TEXAS
U.S. CLERK'S OFFICE
BY: ______ DEPUTY

UNITED STATES OF AMERICA § Cause No.:

v.

ANTONIO AMADOR TORRALBA
JORGE PEREZ

INDICTMENT

[Vio: COUNT ONE: 18 U.S.C. § 554(a) and 2, Smuggling Goods from the United States, Aiding and Abetting; COUNT TWO: 8 U.S.C. § 1326(a) & (b)(1)/(2) Illegal Re-entry into the United States; COUNT THREE: 18 U.S.C. §922(g)(5) & 924(a)(2): Alien in Possession of a Firearm; COUNT FOUR: 18 U.S.C. §922(g)(1) & §924(a)(2), Felon in Possession of a Firearm.]

THE GRAND JURY CHARGES:

DR 14 CR 1769

COUNT ONE
[18 U.S.C. § 554(a)]

On or about April 14, 2014 to December 17, 2014, in the Western District of Texas, the Defendants,

ANTONIO AMADOR TORRALBA,
JORGE PEREZ

did knowingly and unlawfully aid and abet the exportation or attempted exportation from the United States, any merchandise, article, or object, including but not limited to four (4) assault rifles, twenty nine (29) rounds of ammunitions, three (3) magazines, and one (1) rifle scope, which are defense articles as defined under Category I of the United States Munitions List, contrary to any law or regulation of the United States, in that the Defendant had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Section 2778(b)(2) and 2778(c) and Title 22, Code of Federal Regulations, Parts 121, 123, & 127, all in violation of Title 18, United States Code, Section 554(a) and 2.

COUNT TWO
[8 U.S.C. § 1326(a) & (b)(1)/(2)]

That on or about December 17, 2014, in the Western District of Texas, Defendant,

ANTONIO AMADOR TORRALBA,

an alien, attempted to enter, entered, and was found in the United States having previously been denied admission, excluded, deported and removed from the United States on or about March 3, 2005, and that the Defendant had not received the consent of the Attorney General of the United States and the Secretary of the Department of Homeland Security, to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a) and (b)(1)/(2).

COUNT THREE
[18 U.S.C. §922(g)(5)]

On or about April 14, 2014 to December 17, 2014, in the Western District of Texas, the Defendant,

ANTONIO AMADOR TORRALBA,

then being an alien illegally and unlawfully in the United States, did knowingly possess in and affecting commerce a firearm, namely a .45 caliber handgun, and a shotgun, in violation of Title 18, United States Code, Sections 922(g)(5).

COUNT FOUR
[18 U.S.C. §922(g)(1) & §924(a)(2)]

That on or about June 4, 2014, in the Western District of Texas, Defendant,

JORGE PEREZ,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: the Defendant was convicted of Possession of a Controlled Substance; did knowingly possess in and affecting commerce a firearm, Bushmaster .223-556 mm Model XM15-E25 s/n BFI486170, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL.

ROBERT PITMAN
United States Attorney

By: ______________________
RALPH PARADISO
Assistant United States Attorney

SEALED:
UNSEALED: XX

PERSONAL DATA SHEET
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

COUNTY: MAVERICK USAO#: 2014R09198

DATE: DECEMBER 17, 2014 MAG. CT. #: MATTER

AUSA: RALPH PARADISO

DEFENDANT: ANTONIO AMADOR TORRALBA **DR14CR1769**

CITIZENSHIP: MEXICO

INTERPRETER NEEDED: YES LANGUAGE: SPANISH

DEFENSE ATTORNEY: UNKNOWN

ADDRESS OF ATTORNEY: UNKNOWN

DEFENDANT IS: NOT ARRESTED DATE OF ARREST: ____________

BENCH WARRANT NEEDED: YES

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT

OFFENSE: (Code & Description): Count 1 - 18 U.S.C. § 554&2 - Smuggling Goods from the United States; Count 2 - 8 U.S.C. § 1326(a)(1) & (b)(1)/(2) - Illegal Reentry after Deportation; Count 3 - 18 U.S.C. §922(g)(5) & 924(a)(2) - Alien in Possession of a Firearm.

OFFENSE IS: FELONY

MAXIMUM SENTENCE: Counts 1 & 3 - 10 years imprisonment; a $250,000 fine; 3 years of supervised release; and a $100 special assessment; Count 2 - 20 years imprisonment; a $250,000 fine; 3 years of supervised release; and a $100 special assessment.

PENALTY IS MANDATORY: YES & NO

REMARKS: SEE ABOVE

W/DT-CR-3

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PERSONAL DATA SHEET
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

COUNTY: MAVERICK USAO#: 2014R09198

DATE: DECEMBER 17, 2014 MAG. CT. #: MATTER

AUSA: RALPH PARADISO

DEFENDANT: JORGE PEREZ

DR14CR1769

CITIZENSHIP: UNITED STATES

INTERPRETER NEEDED: NO LANGUAGE: ENGLISH

DEFENSE ATTORNEY: UNKNOWN

ADDRESS OF ATTORNEY: UNKNOWN

DEFENDANT IS: NOT ARRESTED DATE OF ARREST: ___________

BENCH WARRANT NEEDED: YES

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT

OFFENSE: (Code & Description): Count 1 - 18 U.S.C. § 554 & 2 - Smuggling Goods from the United States; Count 4 - 18 U.S.C. §922(g)(1) & §924(a)(2), Felon in Possession of Firearm.

OFFENSE IS: FELONY

MAXIMUM SENTENCE: Counts 1 & 4 - 10 years imprisonment; a $250,000 fine; 3 years of supervised release; and a $100 special assessment.

PENALTY IS MANDATORY: YES & NO

REMARKS: SEE ABOVE

W/DT-CR-3